

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

KAYLA GORE; JAIME COMBS;
L.G.; and K.N.,

Plaintiffs,

vs.

Case No. 3:19-0328

WILLIAM BYRON LEE, in his official capacity as Governor of the State of Tennessee; and LISA PIERCEY, in her official capacity as Commissioner of the Tennessee Department of Health,

Defendants.

Videoconference Deposition of:

J₁, G₂

Taken on behalf of the Defendants
April 17, 2020

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Does your family know that -- does your family know of your status as a transgender woman?

MR. ROESSLER: Objection.

THE WITNESS: I'm not sure how to answer that.

BY MR. LIM:

Q. Do your parents know?

A. My mother knows that I'm a trans woman. And my father passed away [REDACTED]
[REDACTED]

Q. I'm sorry to hear that.

Do your siblings know?

A. Yes.

Q. Do your colleagues know?

MR. ROESSLER: Objection.

THE WITNESS: What -- what colleagues are you referring to?

BY MR. LIM:

Q. The previous colleagues at [REDACTED]

A. [REDACTED]

Q. Yes.

A. I'm not sure if I can speculate on knowledge that people possess.

Q. Did you tell anyone -- tell any of your

co-workers about your status as a trans woman?

A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. When did you come out to her?

A. That was around August of 2016, I believe.

Q. Was that at your school, where you are attending school now?

MR. ROESSLER: Objection.

THE WITNESS: I'm sorry, could you repeat that?

BY MR. LIM:

Q. Have you told anyone at your current school, where you're obtaining your master's, of your status as a transgender woman?

A. Yes.

Q. Who are they?

A. I have informed some of my classmates and my immediate cohorts, the professors that I have had, and the director of admissions.

Q. Okay. Thank you.

When did you first identify yourself as a transgender woman?

MR. ROESSLER: Objection.

1 Ms. LG, do you need a break? 01:36:37

2 A. I think I can continue for a little while. 01:36:43

3 Q. Okay. Ms. LG, I'd like to bring your 01:36:46

4 attention to paragraph 137, where you say that you 01:36:56

5 reasonably fear that possessing a birth certificate 01:37:04

6 that fails to reflect your female gender marker 01:37:08

7 increases the likelihood that you would be subject to 01:37:18

8 invasions of privacy, prejudice, discrimination, 01:37:23

9 distress, harassment, and violence. But the 01:37:27

10 instances that you just mentioned didn't involve the 01:37:36

11 birth certificate in any way, no? 01:37:39

12 MR. ROESSLER: Objection. 01:37:44

13 THE WITNESS: When I presented my birth 01:37:51

14 certificate along with all of my documentation and 01:37:54

15 tried to use the documentation to change the gender 01:38:00

16 marker on my driver's license, it was denied. There 01:38:03

17 were other -- there were other experiences -- similar 01:38:16

18 experiences at other DMVs. And there were 01:38:25

19 experiences dealing with law enforcement and medical 01:38:27

20 providers. 01:38:31

21 BY MR. LIM: 01:38:39

22 Q. Do you carry your birth certificate with you? 01:38:39

23 A. I keep my birth certificate locked in a 01:38:46

24 safety deposit box. And it's sealed in an envelope 01:38:51

25 so that no one will ever see it. And my mom is the 01:38:58